

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 20-MJ-__422 (KMM)

UNITED STATES OF AMERICA,

Plaintiff,

v.

JESSICA LYNN WHITE,

Defendant.

FILED UNDER SEAL
PURSUANT TO ORDER

MOTION TO SEAL

The United States of America, by its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Bradley M. Endicott, Assistant United States Attorney, respectfully submits this motion to file the Complaint and accompanying Affidavit under seal.

The United States seeks to seal the Complaint and affidavit because the documents reference a juvenile who is not charged. The documents also reference a co-conspirator who remains at large. Nondisclosure of the search warrant documents is necessary to prevent the ongoing investigation from being compromised. The search warrant documents contain identifying information of and circumstances relating to an individual involved in criminal activity in some way who may not be indicted in this case. Nondisclosure of the search warrant documents at this stage is necessary to protect the person's identity and/or to minimize the substantial risk that revelation of details set forth in the search warrant documents could cause to the person's reputation.

Notwithstanding the above, the United States will disclose the complaint and

affidavit to Ms. White as required to provide notice of the charges.

Dated: June 16, 2020

Respectfully Submitted,

ERICA H. MACDONALD
United States Attorney

s/ Bradley M. Endicott
BY: BRADLEY M. ENDICOTT
Assistant United States Attorney